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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS VALDEZ CASTENEDA,
CARLOS GERMAN FIERRO, and
ALEJANDRO SOTO-MARES,

Defendants.

CASE NO. 1:25-CR-00048-KES-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME; AND
ORDER**

The parties stipulate as follows:

1. A grand jury filed an indictment against defendants on March 13, 2025, and defendants were arraigned the next day. The Court scheduled a status conference on April 9, 2025, and excluded time.
2. The government produced initial discovery to defendants' counsel on March 17, 2025.
3. Now, the parties have met and conferred and agree to continue the status conference until June 11, 2025, to further provide defendants with reasonable time necessary for effective preparation, so that the defendants can review the discovery, and for defendant to consider a pre-trial resolution of the case.
4. The parties also agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial. The parties agree that the period from April 9, 2025, through June 11, 2025, should be excluded. Fed. R. Crim. P. 17.1; 18 U.S.C.

§ 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO STIPULATED.

Dated: March 31, 2025

MICHELE BECKWITH
United States Attorney

/s/ Cody Chapple

Cody Chapple
Arin Heinz
Assistant United States Attorney

Dated: March 31, 2025

/s/ Patrick S Aguirre

Patrick S Aguirre
Law Offices of Patrick S. Aguirre
Counsel for Jesus Valdez Casteneda

Dated: March 31, 2025

/s/ Roger Shahriar Bonakdar

Roger Shahriar Bonakdar
Bonakdar Law Firm
Counsel for Carlos German Fierro

Dated: March 31, 2025

/s/ Erin M. Snider

Erin M. Snider
Office of the Federal Defender
Counsel for Alejandro Soto-Mares

ORDER

The Court has read and considered the parties' stipulation to further continue the status conference and exclude time. The Court finds there is good cause for the continuance so as to allow the defendants reasonable time to complete their review of the discovery and fully consider a pre-trial resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Therefore, for good cause shown:

1. The status conference is continued from April 9, 2025, until **June 11, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**; and
2. The period from April 9, 2025, through June 11, 2025, shall be excluded pursuant to Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: April 1, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE